

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
v.)	Case No. 3:21-MC-00074-FAB
)	
KENDELL LANG, et al.,)	
)	
Defendants,)	
)	
FUSION PROPERTIES MANAGEMENT)	
GROUP, INC., d/b/a FUSION FARMS,)	
)	
Garnishee.)	

**PLAINTIFF/JUDGMENT CREDITOR UNITED STATES OF AMERICA'S
EX PARTE APPLICATION FOR WRIT OF CONTINUING GARNISHMENT
REGARDING DEFENDANT/JUDGMENT DEBTOR KENDELL LANG**

Plaintiff United States of America, by and through the undersigned counsel, makes application in accordance with 28 U.S.C. § 3205(b)(1) to the Clerk of the United States District Court for the District of Puerto Rico to issue a Writ of Continuing Garnishment to Fusion Properties Management Group, Inc., a Puerto Rico corporation operating under the trade name Fusion Farms. The writ is to collect the judgment entered in favor of the United States and against Kendell Lang by the United States District Court for the Southern District of California, and which was duly registered in this district. Kendell Lang's Social Security Number is xxx-xx-0867,¹ and his last known address is 1155 Camino Del Mar, #521, Del Mar, California,

¹ The United States has omitted the first five digits of the Defendant's social security number from this application in compliance with Fed. R. Civ. P. 5.2. The United States will provide the full social security number to the garnishee when it serves the writ of garnishment.

92014, which is a drop box location. The United States has reason to believe that Kendell Lang resides at 950 Calle Bastia, Apt. 207, Rincon, Puerto Rico, 00677.

On July 25, 2008, the United States District Court for the Southern District of California entered summary judgment in the total amount of \$437,812.47, plus interest, against Kendell Lang and in favor of the United States for his personal federal income tax liabilities for tax years 1993, 1995, 1999, 2000, 2001, 2002, and 2004, and for 2002 income taxes as the representative of Patricia Lang's decedent's estate. The United States made demand for payment of the above-stated debt on March 7, 2017, and more than 30 days have elapsed before the date of this filing (as required by 28 U.S.C. § 3205(b)(1)(B)), and the judgment debtor has failed to satisfy the debt. **As of March 12, 2021, with interest and payments and other credits accounted for, the judgment debt is in the amount of \$549,760.39.** In addition, the United States is entitled to the imposition of a surcharge of ten (10) percent of the amount of the debt under the provisions of 28 U.S.C. § 3011, in connection with the litigation of this post-judgment remedy.

The Garnishee is believed to owe money or property to Kendell Lang, currently or in the future, or is in possession of property belonging to Kendell Lang, which property constitutes a substantial non-exempt interest of the judgment debtor.

The name and address of the Garnishee is:

**Fusion Properties Management Group, Inc.
d/b/a Fusion Farms**

***Physical Address:*
212 Calle Los Robles
Carr. 115 K.M., 12.6 Int.
Rincon, PR 00677**

***Mailing Address:*
P.O. Box 103
Rincon, PR 00677**

WHEREFORE, the United States of America petitions the Clerk of the United States District Court for the District of Puerto Rico to issue a Writ of Continuing Garnishment upon the Garnishee.

Dated: March 12, 2021

Respectfully submitted,

DAVID A. HUBBERT
Acting Assistant Attorney General

By: /s/ Philip Doyle
PHILIP DOYLE
Trial Attorney, Tax Division
U.S. Department of Justice
Post Office Box 310
Ben Franklin Station
Washington, D.C. 20044
T: (202) 514-9673
F: (202) 514-9477
E-mail: Philip.A.Doyle@usdoj.gov
ATTORNEY FOR UNITED STATES

OF COUNSEL:
W. STEPHEN MULDROW
United States Attorney
District of Puerto Rico